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14 Attorneys for Defendant
SKYWEST AIRLINES, INC.

15
16 **UNITED STATES DISTRICT COURT**
17
18 **NORTHERN DISTRICT OF CALIFORNIA**
19
20 **SAN FRANCISCO DIVISION**

21 SKYWEST PILOTS ALPA ORGANIZING
22 COMMITTEE, et al.,

23 Plaintiffs,

24 vs.

25 SKYWEST AIRLINES, INC.,

26 Defendant.

Case No. C-07-2688 CRB

**DECLARATION OF TODD EMERSON
REGARDING THE APPROPRIATE
INJUNCTION BOND**

Date: August 2, 2007

Time: 9:30 a.m.

Ctrm: 8, 19th Floor

Judge: Hon. Charles R. Breyer

Action Filed: May 22, 2007

1 1. I reside in St. George, Utah. I am employed by SkyWest Airlines, Inc., in the
2 position of General Counsel – Operations. I base this declaration on my personal knowledge and
3 information maintained by SkyWest in the ordinary course of business. If called upon to testify to
4 the facts contained in this declaration, I could and would do so competently.

5 2. SkyWest has employed three law firms to defend it in this lawsuit. We retained Ford
6 & Harrison LLP, our primary outside labor counsel, because of its expertise in the Railway Labor
7 Act. We initially retained Reed Smith as local counsel; a few days after suit was filed, we replaced
8 Reed Smith with Winston & Strawn.

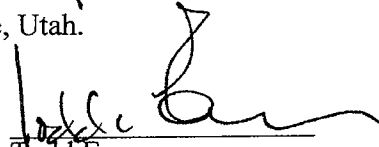
9 3. To date, SkyWest has incurred a total of \$334,713 in attorneys' fees and costs
10 associated with defending itself against the Plaintiffs' efforts to obtain a temporary restraining order
11 and a preliminary injunction. That amount is broken down among the firms as follows:

<u>Firm</u>	<u>Amount Billed</u>	<u>Attorney Billing Rates</u>
Ford & Harrison	\$217,524	\$205 to \$395 per hour
Winston & Strawn	\$ 92,941	\$355 to \$480 per hour
Reed Smith	\$ 18,783	\$235 to \$625 per hour
Witness/Attorney		
Transportation, Hotels		
and Meals	\$ 7,965	

17 4. These figures do not include attorneys' fees and costs that were not directly related to
18 the injunctive relief sought by Plaintiffs. For example, fees and costs associated with our motion to
19 transfer venue and in preparing our motion to dismiss are not included.

20 5. This case has only just begun. With extensive discovery and a trial in the Northern
21 District of California, SkyWest will certainly incur at least \$700,000 attorneys' fees and costs to
22 oppose Plaintiffs' efforts to obtain a permanent injunction, as every relevant witness and piece of
23 evidence will have to be imported to this district.
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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct to the best of my knowledge and belief, and this declaration was
3 executed this 27th day of July, 2007, in St. George, Utah.

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5 Todd Emerson
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